

By ECF

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The Honorable Pamela K. Chen
United States District Judge
United States Courthouse
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

May 30, 2024

Re: United States v. Jeffrey Webb, et al., 15 Cr. 252 (PKC)

On behalf of Mr. Jeffrey Webb, I write with the consent of the Government to respectfully request that the Court allow the following three modifications to the conditions of release under Mr. Webb's bail:

1. Mr. Webb may travel within the United States and its territories without restriction or pre-approval, except that he shall provide his itinerary to Pretrial Services before any such travel;¹
2. The restrictions on Mr. Webb's ability to associate with or have contact with persons under his current conditions of release shall be removed, except that Mr. Webb shall not communicate with any co-defendant, co-conspirator, former co-worker, or FIFA-affiliated entity about the case; and
3. Mr. Webb's passports shall be returned to him for the limited purpose of allowing Mr. Webb to renew his passports and to apply for his state driver's license. Mr. Webb's passports are currently in FBI custody and the FBI shall coordinate with Pretrial Services in Georgia to return the passports to Mr. Webb for this limited purpose. Upon completion of the passport renewal and license application process, Mr. Webb will surrender his passports to Pretrial Services and the FBI.

Mr. Webb's other bail conditions and conditions of release shall remain the same.

I have consulted with Assistant United States Attorney Kaitlin T. Farrell, and the Pretrial Services Office in the Eastern District of New York, and they consent to the requested modifications.

¹ Without this modification, Mr. Webb may only travel within the continental United States, subject to pre-approval by Pretrial Services and prior notice to the FBI.

Thank you for your consideration of this request.

Respectfully submitted,

s/ *Ernie Gao*
Rijie Ernie Gao

cc: United States Attorney's Office, Eastern District of New York (by ECF)
Pretrial Services Office, Eastern District of New York (by e-mail)